

# Exhibit R

WILLIAM LONGO, PH.D., on 02/20/2024  
ROCHELLE KRICH, et al. vs JOHNSON & JOHNSON, et al.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ROCHELLE KRICH, an )  
individual; HERSHIE )  
KRICH, an individual, )  
Plaintiff, )

vs.

Case No. JCCP 4674 /  
21STCV22952

JOHNSON & JOHNSON; )  
JOHNSON & JOHNSON )  
CONSUMER INC., a )  
subsidiary of JOHNSON & )  
JOHNSON; JOHNSON & )  
JOHNSON INTERNATIONAL; )  
ALBERTSONS COMPANIES, )  
INC., individually and as )  
successor in interest to )  
SAV-ON DRUG STORES, INC.; )  
CYPRUS MINES CORPORATION; )  
K MART CORPORATION; RALPHS )  
GROCERY COMPANY; and DOES )  
1 through 400, inclusive, )

Defendants. )

Certified Transcript

(Pages 1 - 143)

Remote Deposition of: WILLIAM LONGO, Ph.D.

Taken on: February 20, 2024

Commencing at: 8:36 a.m.

EVANGELINE AYMOND

Certified Shorthand Reporter #14469

FCRR, RPR, CCR

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12 (formerly known and sued as LTL MANAGEMENT LLC):

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20 Also present:

21 Andrew Sagansay, iDepo Moderator  
22  
23  
24  
25

1 people, right, those individuals we just talked about?

2 A Correct.

3 Q And Mr. Hess, I believe you had testified  
4 before, has been doing PLM analysis for almost 40 years.

5 Is that fair?

6 A Yeah, he could be reaching that now.

7 Q And how long has he worked at your lab, sir?

8 A Thirty-two, 33 years.

9 Q And have you ever had to train Mr. Hess on use  
10 of the PLM?

11 A No.

12 Q I suspected so based on his extensive time  
13 using them before or to date, rather.

14 Does that include --

15 A He was actually trained by Walter McCrone  
16 himself in a previous job he had before he hired him.

17 Q So Mr. Hess worked at McCrone and Associates?

18 A No. He went -- he took the course there.

19 Q I see.

20 A And it was actually Walter McCrone still  
21 teaching the course back when he took it. Same with  
22 Chris Dubour.

23 Q And so my understanding is at some point a  
24 couple years ago your lab changed I think from an  
25 Olympus to -- and I'll probably butcher this -- a Leica

REPORTER'S CERTIFICATE

I certify that the foregoing proceedings in the within-entitled cause were remotely reported at the time therein named; that said proceedings were remotely reported by me, a duly Certified Shorthand Reporter of the State of California, and were thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said cause of action, nor in any way interested in the outcome of the cause named in said cause of action.

IN WITNESS WHEREOF, I have hereunto set my hand this date of February 23, 2024.



EVANGELINE L. AYMOND  
Certified Shorthand Reporter  
State of California  
Certificate No. 14469